



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION IX**  
75 Hawthorne Street  
San Francisco, CA 94105

Via U.S. Postal Service and Email

**DEC 14 2015**

Mr. Robert Cronin, Director  
Old Town Demolition Project  
Lawrence Berkeley National Laboratory  
Mail Stop 75B0101  
One Cyclotron Road  
Berkeley, California 94720  
rdcronin@lbl.gov

**Subject: Lawrence Berkeley National Laboratory - Request for Extension of Storage Time  
for PCB Wastes, Demolition of Buildings 16 and 16A, Old Town Area**

Dear Mr. Cronin:

Thank you for your November 18, 2015 letter requesting the U.S. Environmental Protection Agency Region 9 (EPA) to extend by 60 days the 30-day temporary storage time for polychlorinated biphenyl (PCB) wastes in 40 CFR 761.65(c)(1) for a total of 90 days after the date of waste generation. The date of waste generation for Buildings 16 and 16A are October 29, 2015 and November 18, 2015, respectively. This request is in connection with generation of PCB bulk product waste found in Building 16 and Building 16A, Old Town at Lawrence Berkeley National Laboratory (LBNL).<sup>1</sup>

EPA hereby grants LBNL's request under 40 CFR 761.62(c) for temporary storage of PCB bulk product waste from Building 16 and Building 16A until January 27, 2016 and February 15, 2016, respectively, subject to the conditions specified in this letter. All PCB bulk product waste from Buildings 16 and 16A must be shipped for offsite disposal and no longer be at the accumulation area after January 27, 2016 and February 15, 2016, respectively.

Although not requested by LBNL, EPA is also granting the same extension of the storage time in §761.65(c)(1) under 40 CFR 761.61(c) for non-liquid PCB remediation wastes that may be generated during demolition of Buildings 16 and 16A subject to the conditions specified in this letter.

LBNL proposes to store PCB bulk product waste from demolition of Buildings 16 and 16A at its designated waste accumulation area depicted in the enclosed figures. According to LBNL, the accumulation area is fenced and locked, and only authorized personnel have access to this area. LBNL asserts that all the waste is being placed in containers that meet Department of Transportation (DOT) requirements for transportation to the offsite disposal facility, the accumulation area will be inspected

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<sup>1</sup> PCB bulk product wastes from Building 16 includes painted wood trims in Rooms 109 and 138 and mastic from tile floors in Rooms 138B and 110. PCB bulk product wastes from Building 16A includes insulation and tape.

weekly, and the containers will be placed inside "intermodal containers." LBNL also asserts that storm drains near the accumulation area are protected. Based on this information in LBNL's November 18, 2015 letter, EPA believes that temporary storage of PCB bulk product wastes from the demolition of Buildings 16 and 16A at the accumulation area for up to a maximum of 90 days from the date of waste generation does not present an unreasonable risk of injury to health or the environment.

Conditions for Extension of Storage Time in §761.65(c)(1) Under §761.62(c)

EPA hereby grants LBNL's request under 40 CFR 761.62(c) provided LBNL:

1. Implements the waste storage activities described in its November 18, 2015 letter.
2. Adheres to the requirements in 40 CFR 761.65(c)(1), §761.65(c)(3) and (c)(4), §761.40(a)(10), and applicable requirements in §761.65(c)(6), and 40 CFR 761 Subpart K (e.g., notification of PCB activity).
3. Places all PCB bulk product wastes immediately after generation directly inside the appropriate DOT containers.
4. Posts PCB warning signs on the fence at the LBNL designated PCB waste accumulation area.
5. Meets any additional Federal requirements and all State and local requirements that may apply to packaging, temporary storage, and transportation of PCB bulk product wastes from the demolition of Buildings 16 and 16A.


EPA is granting the same extension of the storage time in §761.65(c)(1) under §761.61(c) to the storage of non-liquid PCB remediation wastes (e.g., concrete contaminated with PCBs) at the designated accumulation area that may be generated during demolition of Buildings 16 and 16A. EPA is granting this extension under the conditions specified above for storage of PCB bulk product wastes from the demolition of these buildings.

In reference to PCB remediation wastes, LBNL states in its November 18, 2015 letter that mastic was removed from tiles in Building 16 (specifically from Rooms 138B and 110). The tiles may be a PCB remediation waste if not decontaminated after removal of the mastic material and may need to be disposed of consistent with applicable disposal requirements in 40 CFR 761.61(a)(5). In addition, the letter mentions excluded PCB products. If LBNL believes that excluded PCB products are present in Buildings 16 and/or 16A, LBNL must submit its justification for EPA review. Please submit this justification within five days after the date of this letter.

PCB bulk product waste from the demolition of Buildings 16 and 16A will be disposed offsite. Please provide the name of the disposal facility within five days after the date of this letter.

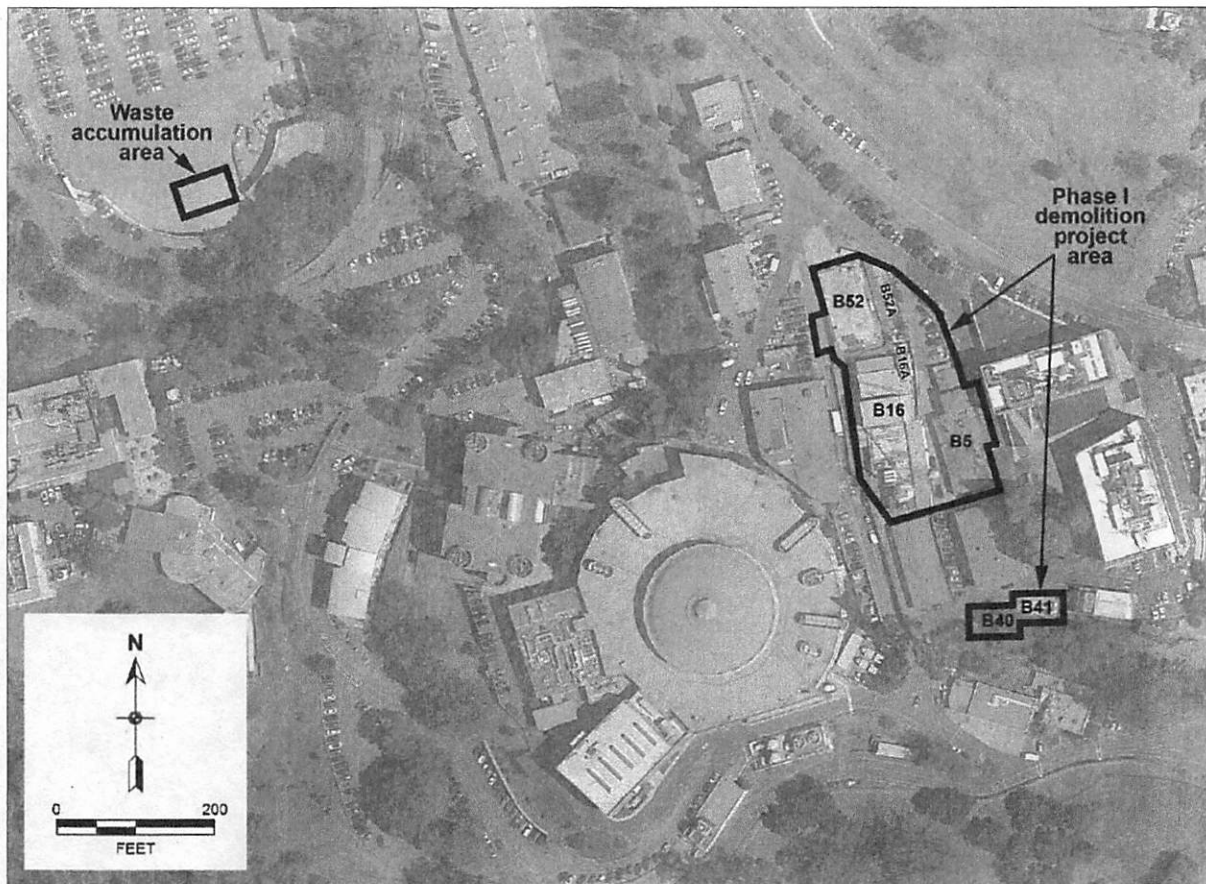
We appreciate the opportunity to being of assistance to LBNL on PCB matters. Please call Carmen D. Santos, Region 9 PCB Coordinator, if you have any questions concerning this letter.

Sincerely,

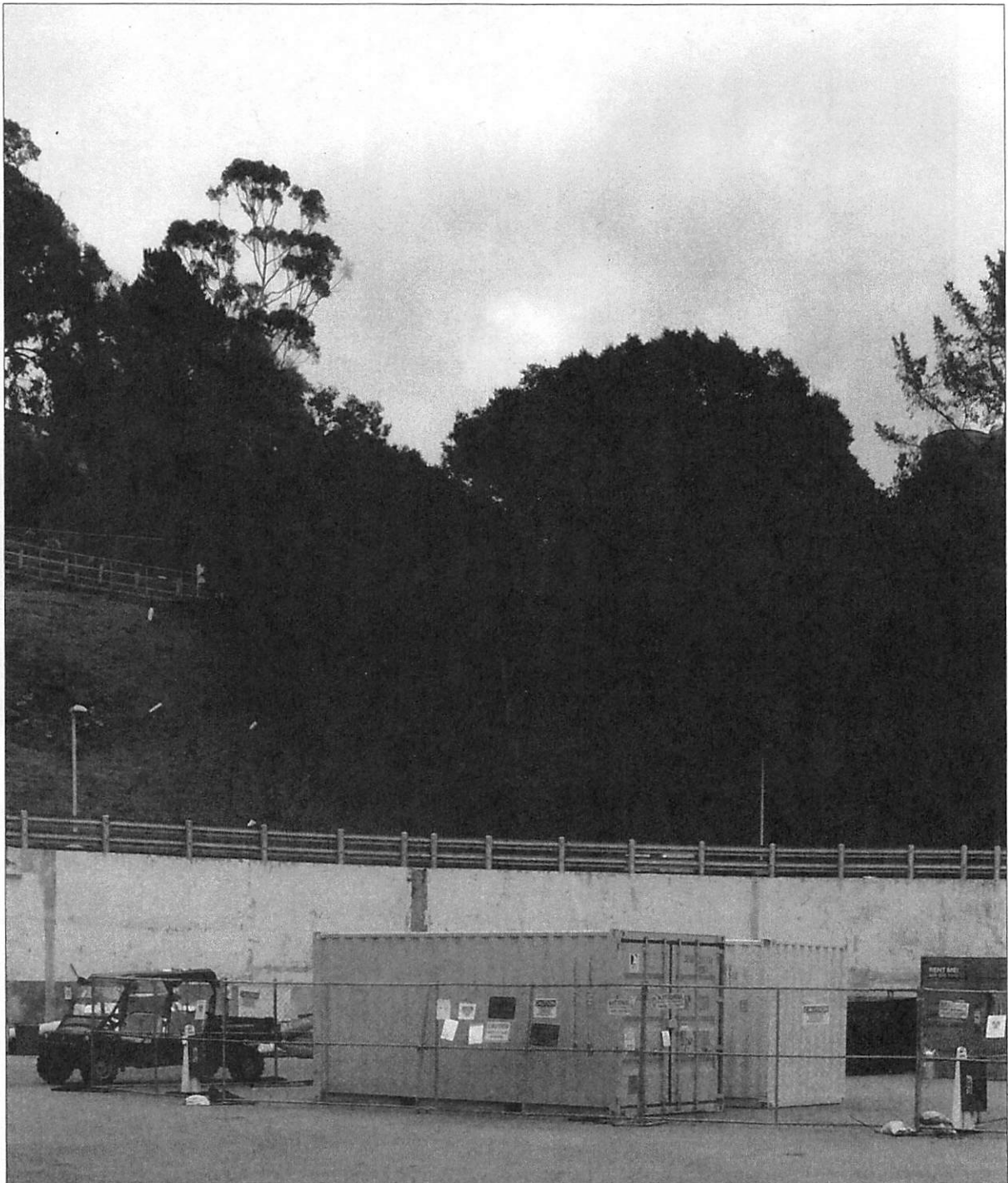
  
for Jeff Scott, Director  
Land Division

Enclosure (Figure)

Cc: Ron Pauer, LBNL ([rpauer@lbl.gov](mailto:rpauer@lbl.gov))  
Joseph Gantos, LBNL ([nigantos@lbl.gov](mailto:nigantos@lbl.gov))  
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**Enclosure 1.**  
Location of Old Town Demolition Project Waste Accumulation Area



**Enclosure 2.**  
Intermodal Shipping Containers